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**CITY OF BEAVERTON
STAFF REPORT AND RECOMMENDATION**

TO: Planning Commission

STAFF REPORT DATE: Wednesday, December 9, 2015

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SUBJECT: Legislative Amendments to Volume 1 and Volume 2 of the City of Beaverton Comprehensive Plan, Ordinance 4187, as amended.

1. CPA2015-0003 - Amendment to Volume I repealing Chapter 4, Housing, and replacing it with the updated Chapter 4 - Housing; and amendment to Volume 2 (Background and Supporting Documents) adding the Housing Strategies Report (July 2015).
2. CPA2015-0004 - Amendment to Volume I repealing the Introduction, and replacing it with the updated Introduction.

REQUEST: The City is proposing to update the Introduction and Chapter 4 - Housing of the City's Comprehensive Plan

INITIATED BY: City of Beaverton

APPLICABLE CRITERIA: Criteria for Legislative Amendments are listed in Section 1.5 of the Comprehensive Plan

HEARING DATE: Wednesday, December 16, 2015

RECOMMENDATION: Staff recommend the Planning Commission review the proposed amendments, hold a public hearing, and recommend approval of CPA2015-0003 and CPA2015-0004 to the City Council.

1. Background

A Comprehensive Plan is a municipality's road map for the future. The plan is typically written for a 20-year time period, and provides policy direction on matters related to future growth and physical development of the city including land use, economy, transportation, housing and natural resources and other relevant topics. Oregon state law requires all cities and counties to prepare and adopt comprehensive plans that are consistent with Statewide Planning Goals, which are the framework of the state's land use planning system. Upon approval by the state's Land Conservation and Development Commission (LCDC), a Comprehensive Plan is said to be *acknowledged* and becomes the City's controlling document for land use policy.

Beaverton's existing Comprehensive Plan, Volume 1 contains an introduction and the following ten chapters, also referred to as elements:

1. Comprehensive Plan Amendment Procedures
2. Community Involvement
3. Land Use
4. Housing
5. Public Facilities and Services
6. Transportation
7. Natural, Cultural, Historic, Scenic, Energy, and Groundwater Resources
8. Environmental Quality and Safety
9. Economy
10. Community Health

Comprehensive plan updates are typically undertaken when chapters of the plan become outdated and do not accurately reflect recent trends or conditions in the community. Since its original adoption in 1972, the City's Comprehensive Plan has undergone a number of major updates and minor plan amendments. The most extensive update occurred in 2002, at which time the city was engaged in the state's periodic review process and updated the majority of the Comprehensive Plan's elements. Since that time, the Comprehensive Plan has been amended several times, including the adoption of the new Community Health Element (Chapter 10) in 2014 and the updated Community Involvement Element (Chapter 2) in 2015. Changes to the Comprehensive Plan outside of the state's periodic review process are called post-acknowledgment plan amendments.

Since periodic review in 2002, the community has experienced significant economic and demographic changes, including a housing boom, followed by a major economic recession, and the current economic and housing recovery. In addition, the City Council adopted the Community Vision in 2010, the Beaverton Urban Renewal Plan and the Civic Plan in 2011, and Creekside District Master Plan in 2014, establishing a number of new goals, recommendations, actions and strategies to help guide future planning efforts and public investments in the City.

Extensive outreach throughout these planning projects brought many voices into the public conversation about the future of the City. Significant focus of these planning efforts was directed toward revitalization of the central core of the City in which around 2,000 new housing units are anticipated to be added over the next 20 years, largely through redevelopment.

Following adoption of the Civic Plan in 2012, it was determined that an update to several chapters of the City's Comprehensive Plan was needed to reflect current conditions and projected trends, and to ensure consistency with recent planning and visioning efforts. The City Council directed city staff to begin the Comprehensive Plan update process - known as Comprehensive Plan 2035 - by updating the Housing Element (Chapter 4) and the Economy Element (Chapter 9).

Comprehensive Plan 2035 kicked off in spring of 2014, with the goal of updating the Housing and Economy elements to reflect current trends and address projected 20-year housing and employment needs within the city. As the planning process unfolded, it became apparent that a new Introduction would improve clarity and provide context by describing the various planning efforts and changes that have occurred in the community since the last major plan update in 2002. Additionally, the community and decision-makers have emphasized the importance of policies and actions that will contribute to a more sustainable, equitable, resilient, and livable city. These "major themes" as described in the Introduction are intended to be woven throughout each element as updates to the Comprehensive Plan occur over time.

Following several rounds of public input and review, staff has prepared amendments intended to replace the existing Introduction (Exhibit 1) and Chapter 4 - Housing (Exhibit 2) in their entirety. These proposed amendments are the subject of this public hearing. Amendments to Chapter 9 - Economy, which will also be a complete rewrite and replacement of the existing chapter are anticipated to be brought before the Planning Commission in the first few months of 2016. The Economy Element will be followed by updates to the Chapter 3 - Land Use and Chapter 6 - Transportation.

2. Summary of Proposed Amendments

As noted above, the subject proposal is to amend the Introduction (CPA2015-0004) and Chapter 4 - Housing (CPA2015-0003) of Volume 1 of the City of Beaverton Comprehensive Plan. The proposed amendments are complete rewrites intended to replace the existing Introduction and Chapter 4. These amendments are the result of an 18-month planning process that included substantial input from the public, project advisory committees, Beaverton Committee for Community Involvement (BCCI), Planning Commission and City Council. The updates seek to make the Comprehensive Plan more readable and user-friendly, and include a new format that incorporates photos, sidebars, and graphics that highlight key information and provide visual interest. A summary of the primary features and substance of the updated Introduction and Housing Element is included below.

Introduction (CPA2015-0004)

The updated Introduction sets the stage for the plan elements and explains the role and requirements of the Comprehensive Plan, the applicable regional and state regulatory framework, and the plan's relationship to other city documents and planning efforts, including the Beaverton Community Vision. The Introduction describes Beaverton's growth, changing demographics, constrained land supply, and ongoing transformation from a traditional suburban community to a more urban place. Four major themes – livability, equity, sustainability, and resiliency – are presented as important public values intended to guide future chapter Comprehensive Plan updates

The existing Comprehensive Plan Introduction defines the structure of the plan including a hierarchy of goals, objectives, policies, and recommended programs, projects and actions. Starting with the proposed update to the Housing Chapter, the programs, projects and actions will no longer be included in the Comprehensive Plan document itself. Instead, implementation plans with a menu of recommended programs, projects and activities linked to Comprehensive Plan policies will be created to serve as companion documents to the Comprehensive Plan. This structure will allow the City to be more responsive and nimble by not requiring a Comprehensive Plan amendment process whenever new implementation opportunities or tools are identified.

Chapter 4 - Housing (CPA2015-0003)

The Housing Element is the first chapter that illustrates the new format for successive updates to the Comprehensive Plan, with a number of photographs, sidebars and graphics that break up the narrative and make the content more visually appealing and readable. The chapter has been divided into five sections (4.1 through 4.5), each with a central goal and a series of policies supporting that goal.

The five sections in updated Chapter 4 include: 4.1. Housing Supply; 4.2 Housing Type; 4.3 Housing in the Central City; 4.4 Fair and Affordable Housing; and 4.5 Livability and Neighborhood Character. Sections 4.1 through 4.4 are consistent with those currently found in Chapter 4 of the Comprehensive Plan, in that they have the same section titles. However, new background information, goals and policies have been crafted to replace the existing text. Section 4.5 is an entirely new section not previously included in Chapter 4. This new section, added at the request of the Planning Commission and City Council in October 2015, identifies the qualities and characteristics that make Beaverton a unique and desirable place to live, and establishes policies intended to preserve and enhance livability and neighborhood character as the city continues to grow in the future.

As a whole, the five sections comprising Chapter 4 meet the requirements of Statewide Planning Goal 10 - Housing (discussed in further detail below and in Section 4 of this staff report), and describe the current and future housing needs of Beaverton as it transitions from a traditional suburban bedroom community to a city that is becoming more diverse and urban. Goals and policies have been developed to provide a decision-making framework aligned with the vision for Beaverton to provide a full range of housing options and lifestyle choices for all current and future residents. The overall housing policy framework supports the transformational change associated with increasing urbanization,

while recognizing the challenges that come with meeting the needs of all socioeconomic groups within the City.

As noted above, recommended actions are not included in the updated Housing Element, but have been incorporated in a draft Housing Implementation Plan (HIP). The HIP will provide a menu of various programs, projects and activities that are linked to goals and policies in Chapter 4. A copy of the draft HIP is attached for informational purposes as Exhibit 4, but is not part of the proposed legislative amendments to the Comprehensive Plan that are the subject of the public hearing.

The next step is to create a Five-Year Housing Action Plan that will identify and prioritize items from the HIP strategically to help inform annual budget decisions. The action plan is proposed to be reviewed annually to assess implementation progress and re-evaluate priorities.

To ensure compliance with Statewide Planning Goal 10 – Housing the City contracted with Angelo Planning Group to complete a Housing Strategies Report, which includes a Housing Needs Analysis. The updated Chapter 4 includes some of the findings of this analysis, but the majority of the data that provides a factual basis for housing goals and policies is found in the Housing Strategies Report, which is being added to Volume 2 of the Comprehensive Plan (Background and Supporting Material) as part of this amendment process.

3. Summary of the Legislative Process

The proposed amendments to the Introduction and Chapter 4 are the result of several phases of public input, technical analysis, goal and policy development, and public review. Various drafts of the documents have been reviewed by the Planning Commission, City Council, project advisory committees, city boards and commissions, and the general public. Over the past 18 months, hundreds of comments were received, helping inform the nature and content of the proposed amendments. A summary of this process, broken down into general phases, is described below.

Phase I: Project Approach and Framework (Winter/Spring 2014)

Comprehensive Plan 2035 kicked off with a joint meeting of the Planning Commission and City Council on January 28, 2014, during which staff explained the approach for updating the Comprehensive Plan. After receiving additional direction from the commission and council, over the next six months a public involvement plan was created and advisory committees were formed. A Community Advisory Committee (CAC), comprised of city residents, and Housing Technical Advisory Committee (HTAC), comprised of industry professionals, guided development and review of the updated chapters, with the first meetings held in June 2014. A consultant was selected to complete the Statewide Goal 10 - Housing analysis.

Phase II: Public Outreach and Technical Analysis (Summer/Fall 2014)

The second phase of the project involved work on the city's Goal 10 analysis, Buildable Lands Inventory (BLI) and an extensive public outreach campaign. Between June and August 2014, staff worked with the Visioning Advisory Committee, and attended ten public events (Picnics in the Park, Farmer's Market, Beaverton Last Tuesday) engaging the community to identify housing needs and preferences. A comprehensive housing survey was mailed to nearly 61,000 households in November 2014 and also made available online. Nearly 2,100 surveys were returned to the City, identifying a number of housing issues important to residents. Staff briefed the Planning Commission and City Council on project progress at a joint work session on August 12, 2014, and held CAC and HTAC meetings in November 2014 to discuss preliminary outreach results.

Phase III: Text Amendment Development (Winter/Spring 2015)

Over the first six months of 2015, staff coordinated with the CAC and HTAC to review the Goal 10 analysis and public comments, and to begin drafting the updated Introduction and Housing element. On February 17, 2015, the City Council and Planning Commission held a joint work session to review the status of the project. Discussion among councilors and commissioners at this meeting included integration of sustainability, equity, resiliency, and livability into future chapter updates as guiding principles (since renamed as major themes). By July 2015, the Goal 10 analysis had been completed and early working drafts of the Introduction and Housing element were reviewed by staff from several city divisions and departments.

Phase IV: Public Review and Adoption of Proposed Amendments (Summer/Fall 2015)

After incorporating comments from city staff, drafts of the Introduction and Chapter 4 were reviewed by the CAC, HTAC, Planning Commission, City Council, Diversity Advisory Board (DAB), Beaverton Council on Aging and BCCI at meetings held July through September 2015. These meetings generated substantial feedback primarily focused on reducing the amount of data and technical jargon and improving the overall visual appearance and readability of the documents.

The Introduction and Chapter 4 were revised accordingly, resulting in the public review drafts that were made available on the city website on October 13 and advertised through a variety of channels. The documents were available for public review between October 13 and November 6, during which time staff received 12 comments. A joint meeting of the Planning Commission and City Council was held on October 20 to discuss the public review drafts. Additional comments and suggestions were received at this meeting, including the desire to see a new section (Section 4.5) in Chapter 4 that addressed concepts related to livability and what makes Beaverton an attractive and desirable place for city residents. In response, a new Section 4.5 – Livability and Neighborhood Character was added to the draft reviewed by the Planning Commission at their November 18, 2015 work session. Minor changes made to Chapter 4 subsequent to that work session are reflected in the attached public hearing draft (Exhibit 2).

4. Comprehensive Plan Amendment Procedures

Section 1.1.1 establishes procedures for city-initiated amendments of the Comprehensive Plan, stating that amendment requests shall be submitted to the Community Development Director for preparation and analysis for a Planning Commission public hearing or City Council consideration. The Planning Commission and City Council have the right to accept, reject or modify any specific request for amendment in accordance with the City's policies and procedures.

Section 1.3 identifies legislative amendments to the Comprehensive Plan text or map as those having a generalized nature that are initiated by the City, and which apply to an entire land use map category or a large number of individuals or properties, or that establish or modify policy or procedure. Legislative amendments include additions or deletions of text or land use map categories.

Section 1.4.1 establishes the notice requirements for legislative amendments including: inter-agency notice of the initial hearing to the Department of Land Conservation and Development (DLCD), as well as to Neighborhood Association Committees (NACs) and BCCI; publication in a newspaper of general circulation; posting in Beaverton City Hall and the Beaverton City Library; and posting on the city's website.

Section 1.5.1 outlines the criteria for legislative amendment decisions. For the proposed Comprehensive Plan text amendments, the findings are as follows:

1.5.1.A. The proposed amendment is consistent and compatible with relevant Statewide Planning Goals and related Oregon Administrative Rules;

Of the 19 Statewide Planning Goals, Goals 1 (Citizen Involvement) and 10 (Housing) are directly applicable to the proposed amendments.

Goal 1 - Citizen Involvement

Statewide Planning Goal 1 calls for cities and counties to "develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process", and that "the citizen involvement program shall be appropriate to the scale of the planning effort".

The Beaverton Citizen Involvement Program adopted by Resolution 2229 in 1980, established a formalized public participation program for the Beaverton Committee for Community Involvement (BCCI) that provides a method by which the committee and other community members can communicate their opinions and inquiries about city matters, including the planning process.

As previously noted in Section 3 of the staff report, the process to update the Introduction and Housing Element, including robust public outreach and community involvement, began in Spring 2014, and over the last 18 months has provided multiple opportunities for residents, business owners, employees, advisory committee members, BCCI, and

elected and appointed city officials to review and comment on the proposed amendments. Substantial public input has been received over the course of the legislative amendment process, resulting in comprehensive plan updates that are aligned with the aspirations of the community vision, and with relevant goals and policies established by other recent planning efforts.

Goal 10 - Housing

As part of its update to the Housing element, the city was required to complete a Housing Needs Analysis to show compliance with Statewide Planning Goal 10 - Housing. Statewide Planning Goal 10 calls on cities and counties “to provide for the housing needs of citizens of the state”, and requires that comprehensive plans include, at a minimum, the following:

- an inventory of buildable lands;
- a comparison of the distribution of the existing population by income with the distribution of available housing units by cost;
- a determination of vacancy rates, both overall and at varying rent ranges and cost levels;
- a determination of expected housing demand at varying rent ranges and cost levels;
- allowances for a variety of densities and types of residences in each community; and
- an inventory of sound housing in urban areas including units capable of being rehabilitated.

The City contracted with Angelo Planning Group and Johnson Economics to complete a Housing Needs Analysis, which is incorporated into the attached Housing Strategies Report (Exhibit 3) that will be added to Volume 2 of the Comprehensive Plan (Background and Supporting Material) in conjunction with the Chapter 4 amendments. The Housing Strategies Report identified a mismatch between current housing supply and needs. Generally, there is an unmet demand for additional ownership units at a range of price points and housing types. The city’s current unmet housing needs are especially pronounced for very low income renter households and high income homeowner households. Goals and policies in Chapter 4 have been developed to address these unmet needs.

The Housing Strategies Report further forecasts a shortage of land available for single family residential land within the City, whereas a surplus is anticipated in the City’s Urban Service Boundary over the 20-year planning period. Oregon Department of Land Conservation and Development (DLCD) staff have indicated support for a sub-regional approach that counts part of the forecasted single family residential surplus in the unincorporated area outside the City boundary, but within its USB, toward the City’s 20-year land supply as a way to achieve compliance with Statewide Planning Goal 10.

The Housing Strategies Report has been reviewed by DLCD which found it to be consistent with the requirements of Statewide Planning Goal 10.

The Metropolitan Housing Rule (OAR 660-007-0030)

The Metropolitan Housing Rule requires that cities provide the opportunity for at least 50% of future dwelling units to be attached unit types. As part of the Housing Needs Analysis, a Buildable Lands Inventory (BLI) was completed in 2015 to estimate housing capacity over a 20-year planning horizon. Citywide, the BLI showed a capacity for approximately 13,306 housing units based on current zoning, with 8,273 (63%) of those units comprising multi-family or medium density attached units. As such, the city's current zoned capacity and projected 20-year housing supply meet the requirements of OAR 660-007-0030.

Finding: Staff finds that the proposed amendments to the Comprehensive Plan Introduction and Housing Element are consistent and compatible with Statewide Planning Goals 1 and 10 and the Metropolitan Housing Rule, thereby satisfying Criterion 1.5.1.A.

1.5.1.B. The proposed amendment is consistent and compatible with the applicable Titles of the Metro Urban Growth Management Functional Plan and Regional Transportation Plan;

The applicable Titles of the Metro Urban Growth Management Functional Plan (UGMFP Chapter 3.07) are addressed below. Transportation policies are not addressed in the proposed Chapter 4 amendments, but Chapter 6 – Transportation will be updated in the future to comply with the Regional Transportation Plan (RTP), which is currently under revision by Metro.

Title 1: Requirements for Housing and Employment Accommodation

Section 3.07.110 of the UGMFP calls for a compact urban form and a “fair-share” approach to meeting regional housing needs, and asks cities to help meet regional housing needs by maintaining or increasing their housing capacity. As shown in the city's Housing Strategies Report and Buildable Lands Inventory, the city has capacity for just under 10,700 housing units, with the majority (63%) comprised of multi-family and medium density units, which is adequate to meet its share of projected regional growth over the next 20 years. However, while there is excess zoned capacity for multi-family residential development, there is a large deficit of vacant land available for single family residential development to meet the projected 20-year need.

Recognizing that the City's excess multi-family capacity will contribute to a more compact urban form and help reduce the need for future Urban Growth Boundary (UGB) expansions, it may be appropriate to consider targeted UGB expansions to provide additional single family residential capacity within the City. Overall, the amendments are consistent with Metro Title 1.

Title 7: Housing Choice

The intent of Metro Title 7 is to enact a “fair share” housing strategy for each jurisdiction, which includes a diverse range of housing types; specific goals for low- and moderate-income housing; housing densities consistent with the regional transportation system; and a balance of jobs and housing. The Housing Element is the city’s primary document demonstrating compliance with Title 7.

The proposed update to Chapter 4 includes five sections that address all of the above-listed requirements of Title 7. A sample of proposed Chapter 4 policies that illustrate compliance with Metro Title 7 include the following:

Policy 4.1.1.a: Use available land within the city efficiently, encouraging new residential development to take advantage of allowed maximum densities where appropriate

Policy 4.1.1.e: Develop programs or strategies to improve Beaverton’s jobs-housing balance, thereby reducing impacts on transportation infrastructure and the environment

Policy 4.2.1.a: Ensure that sufficient land is appropriately zoned to meet a full range of housing needs, including an adequate amount of detached single family housing to meet projected demand

Policy 4.4.1.a: Obtain local, state, and federal financial resources and incentives that support the development and preservation of affordable units, including within market-rate developments that include income-restricted affordable units

Policy 4.4.1.b: Explore and promote programs and incentives that help support the creation of new affordable housing

Policy 4.4.1.d: Exhibit a commitment to equity by encouraging the dispersal of affordable and special needs housing throughout the city, while recognizing the need for proximity to transit and social services

Policy 4.4.1.k: Focus economic development efforts on industries that provide wages that allow employees to afford to live in Beaverton or nearby areas, thereby improving the city’s jobs-housing balance

As illustrated above, the goals and policies in the updated Chapter 4 are consistent with Metro Title 7.

Title 8: Compliance Procedures

Section 3.07.810.A of Metro Title 8 establishes a process for determining whether city or county comprehensive plans and land use regulations substantially comply with requirements of the UGMFP, and requires cities to submit proposed comprehensive plan

amendments to Metro for their review. Notice and a copy of the proposed amendments were sent to Metro more than 45 days prior to the first evidentiary hearing as required by Metro Code Section 3.07.820. No responses from Metro have been received to date.

Finding: The proposed amendments substantially comply with the relevant UGMFP Titles. The RTP is not applicable to the proposed amendments to the Introduction and Chapter 4 of the Comprehensive Plan. Criterion 1.5.1.B. is satisfied.

1.5.1.C. The proposed amendment is consistent and compatible with the Comprehensive Plan and other applicable local plans;

The proposed amendments consist of updates to the Comprehensive Plan Introduction and Housing Element (Chapter 4). The updates were initiated in order to make the Comprehensive Plan current and more readable and user friendly, and to account for current and anticipated demographic changes, development trends, and housing needs and supply. The updates also incorporate major concepts, goals, and policies from recent planning efforts, including the Beaverton Community Vision, Civic Plan, Urban Renewal Plan, Creekside District Master Plan and South Cooper Mountain Community Plan.

The proposal complies with the procedures and requirements for legislative Comprehensive Plan amendments established in Chapter 1 (Amendment Procedures) and described above. Pursuant to the notice requirements specified in Section 1.4.1 (described above) Notices for the Planning Commission public hearing were mailed to DLCD, Metro, Washington County, the NAC Chairs, and the BCCI Chair on September 30, 2015 (at least 45 days prior to the scheduled hearing); posted in the Beaverton Building, the City Library, and on the city website on November 24, 2015 (between 20 and 40 days prior to the hearing); and was published in the Beaverton Valley Times on November 26, 2015 (between 20 and 40 days prior to the hearing). No written testimony has been received since the posting date of this report.

The proposed amendments were developed through an extensive public outreach and review process consistent with the intent of Chapter 2 -Community Involvement, which was updated in June 2015 to simplify the planning process for city residents and other stakeholders and to increase opportunities for community involvement.

The updates to Chapter 4 improve the readability of the document and provide goals and policies based on recently completed demographic analysis, housing needs/supply projections, housing trends and community input. As such, the proposed amendment is consistent with Chapter 2.

As other chapters of the Comprehensive Plan are updated, including Chapter 3 – Land Use, Chapter 6 – Transportation, and Chapter 9 – Economy, consistency and relationship among policies of all chapters will be a prime consideration as amendments are prepared.

Finding: The proposed amendments are consistent with the policies of Chapters 1 through 10 of the Comprehensive Plan; therefore, Criterion 1.5.1.C. is met.

1.5.1.D. If the proposed amendment is to the Land Use Map, there is a demonstrated public need, which cannot be satisfied by other properties that now have the same designation as proposed by the amendment.

The proposal does not include changes to the Land Use Map; therefore, approval Criterion 1.5.1.D. is not applicable.

Finding: Approval Criterion 1.5.1.D. is not applicable.

Summary Findings for CPA2015-0003 and CPA2015-0004: Based on the facts and findings presented, staff conclude that the proposed text amendments to the Comprehensive Plan are consistent with all Legislative Comprehensive Plan amendment approval criteria set forth in Section 1.5.1.A. through D.

5. Staff Recommendations

Based on the facts and findings outlined in this staff report and contained in supporting documents, staff recommends the following steps for the December 16, 2015 public hearing for CPA2015-0003 (Chapter 4 - Housing) and CPA2015-0004 (Introduction):

- A. Open the public hearing.
- B. Receive all public testimony.
- C. Close the public hearing.
- D. Considering the public testimony and the facts and findings presented in the staff report and supporting documents, deliberate on policy issues and other issues identified by the Commission or the public.
- E. Recommend **APPROVAL** of proposed legislative text amendments CPA2015-0003 and CPA2015-0004 to the City Council.

6. Exhibits

Exhibit 1. Introduction, amendment to Volume 1, City of Beaverton Comprehensive Plan

Exhibit 2. Chapter 4 – Housing, amendment to Volume 1, City of Beaverton Comprehensive Plan

Exhibit 3. Housing Strategies Report (Statewide Planning Goal 10 Analysis), amendment to Volume 2 (Background and Supporting Documents), City of Beaverton Comprehensive Plan

Exhibit 4. Draft Housing Implementation Plan (for informational purposes only)